

EXHIBIT B

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
[1-P] A finger-worn wearable ring device, comprising:	<p>Plaintiff asserts that the preamble is limiting. The Accused Products are a finger-worn wearable ring device:</p> 

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	<p style="text-align: center;">RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)</p>
	<p>Accurate Health Starts on Your Finger</p> <p>Unlike wrist-worn smartwatches, the RingConn Gen 2 Smart Ring utilizes the finger's thin skin and abundant capillaries for precise tracking. Despite its slim design, the RingConn Gen 2 incorporates advanced PPG sensors, temperature sensors, and 3D accelerometers to ensure exceptional accuracy.</p>
[1-A] an external housing component defining an outer circumferential surface of the finger-worn wearable ring device	<p>The Accused Products include an external housing component defining an outer circumferential surface of the finger-worn wearable ring device. If RingConn argues that the claimed element of “external housing component defining an outer circumferential surface” is not literally met (Plaintiff disputes any such characterization), this limitation is satisfied under doctrine of equivalents because any difference between the claim element and the accused element is insubstantial. Indeed, the accused element (i.e., outer metallic surface) performs substantially the same function, in substantially the same way, to achieve substantially the same result as the claimed “external housing component defining an outer circumferential surface,” because the accused element includes a substantially curved, circular, and/or peripheral surface to allow the finger-worn wearable ring device to conform to user's fingers and to create space to house battery and flexible printed circuit board components.</p>

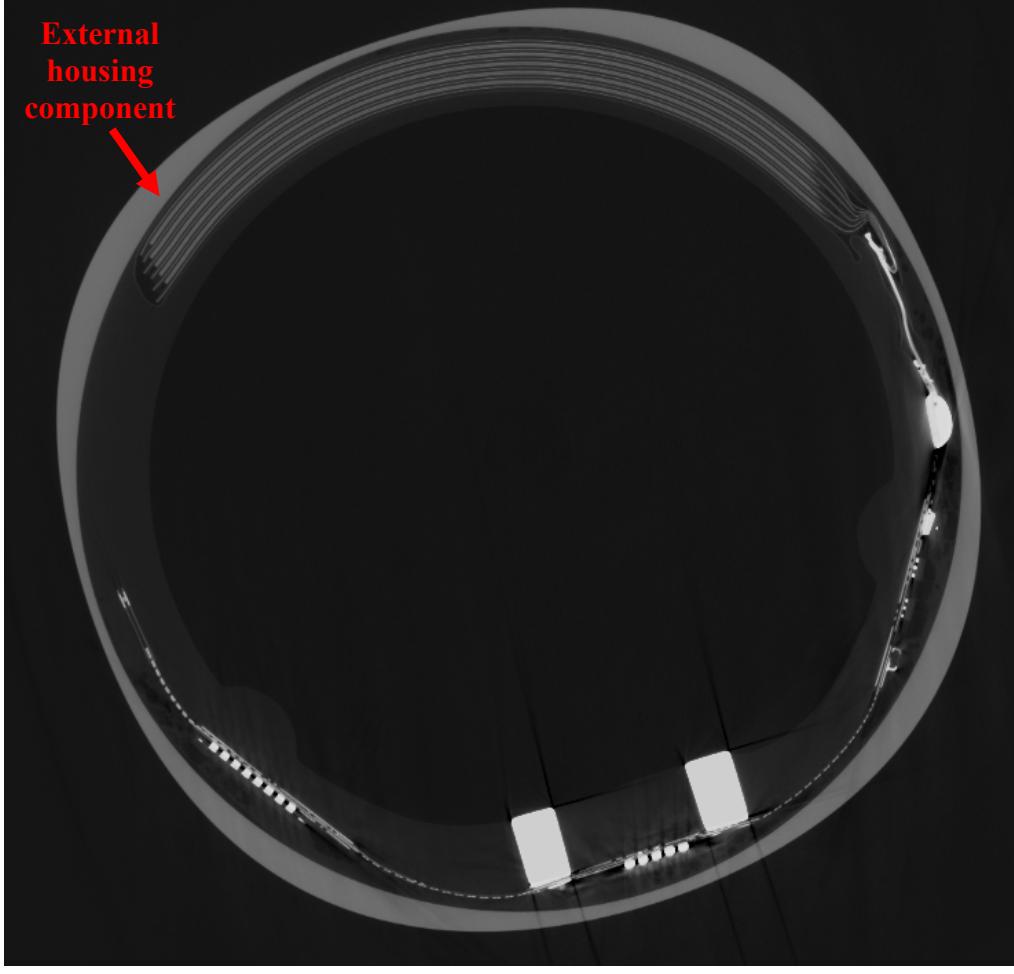
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

<p>Independent Claim 1 of the '178 patent</p>	<p>RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)</p>
	<p>External housing component</p> <p>Internal housing component</p>

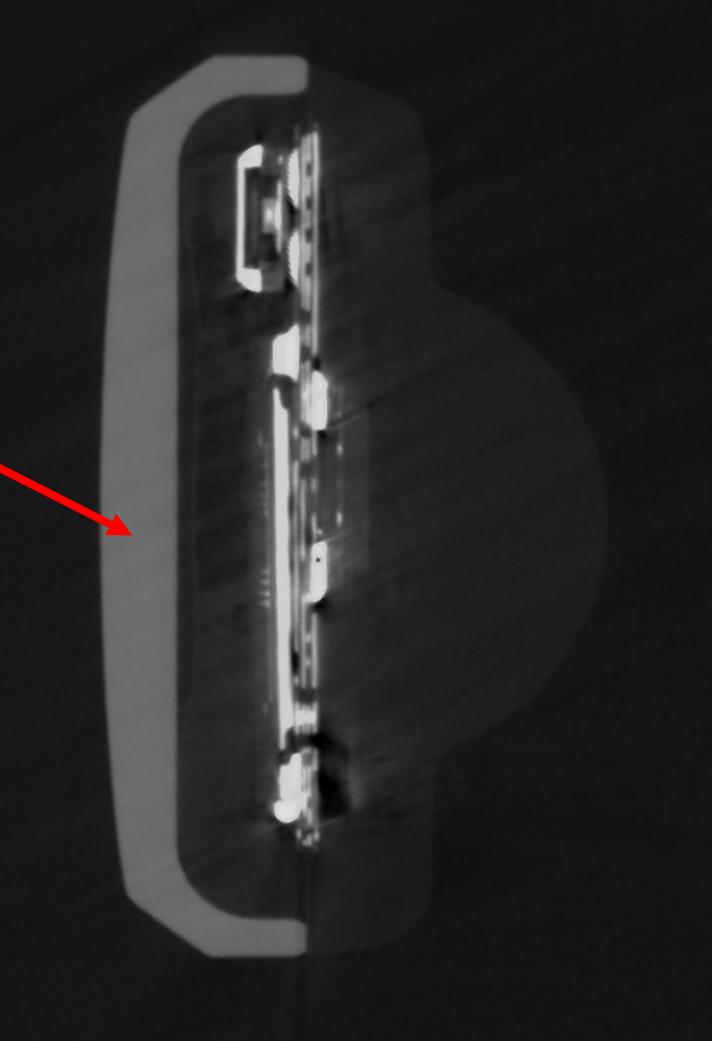
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p data-bbox="734 1041 897 1139">External housing component</p> <p data-bbox="1700 1057 1926 1161">Outer circumferential surface</p>

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>External housing component</p>

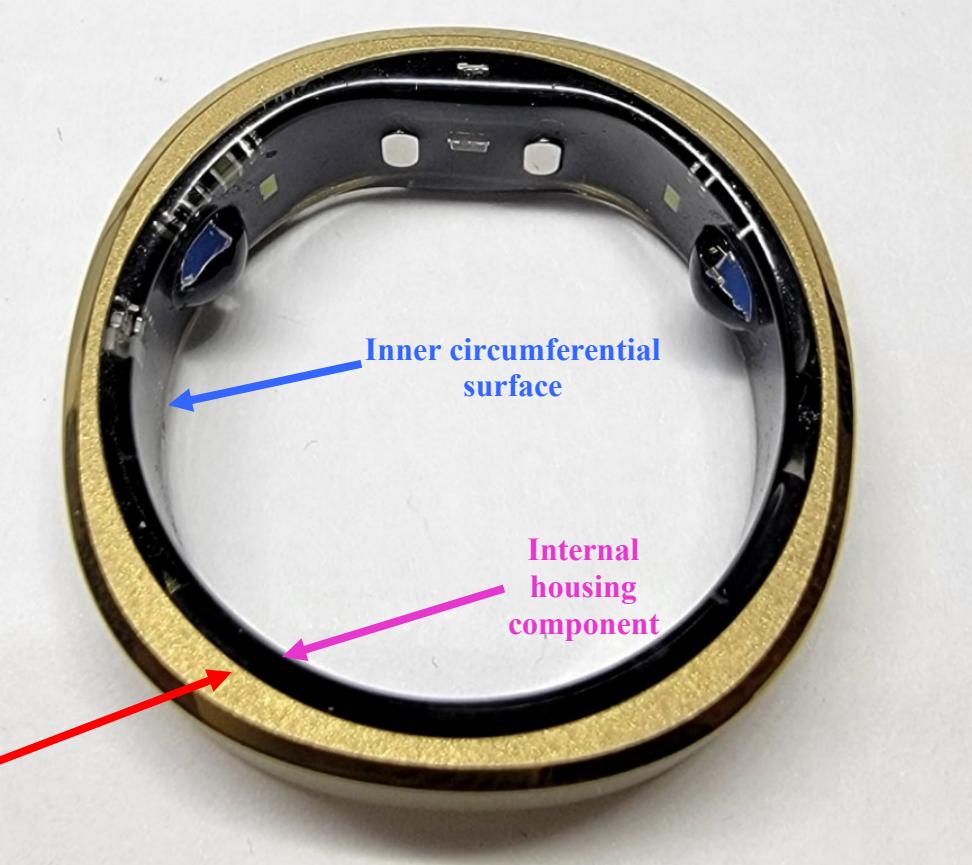
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p data-bbox="494 626 663 731">External housing component</p>

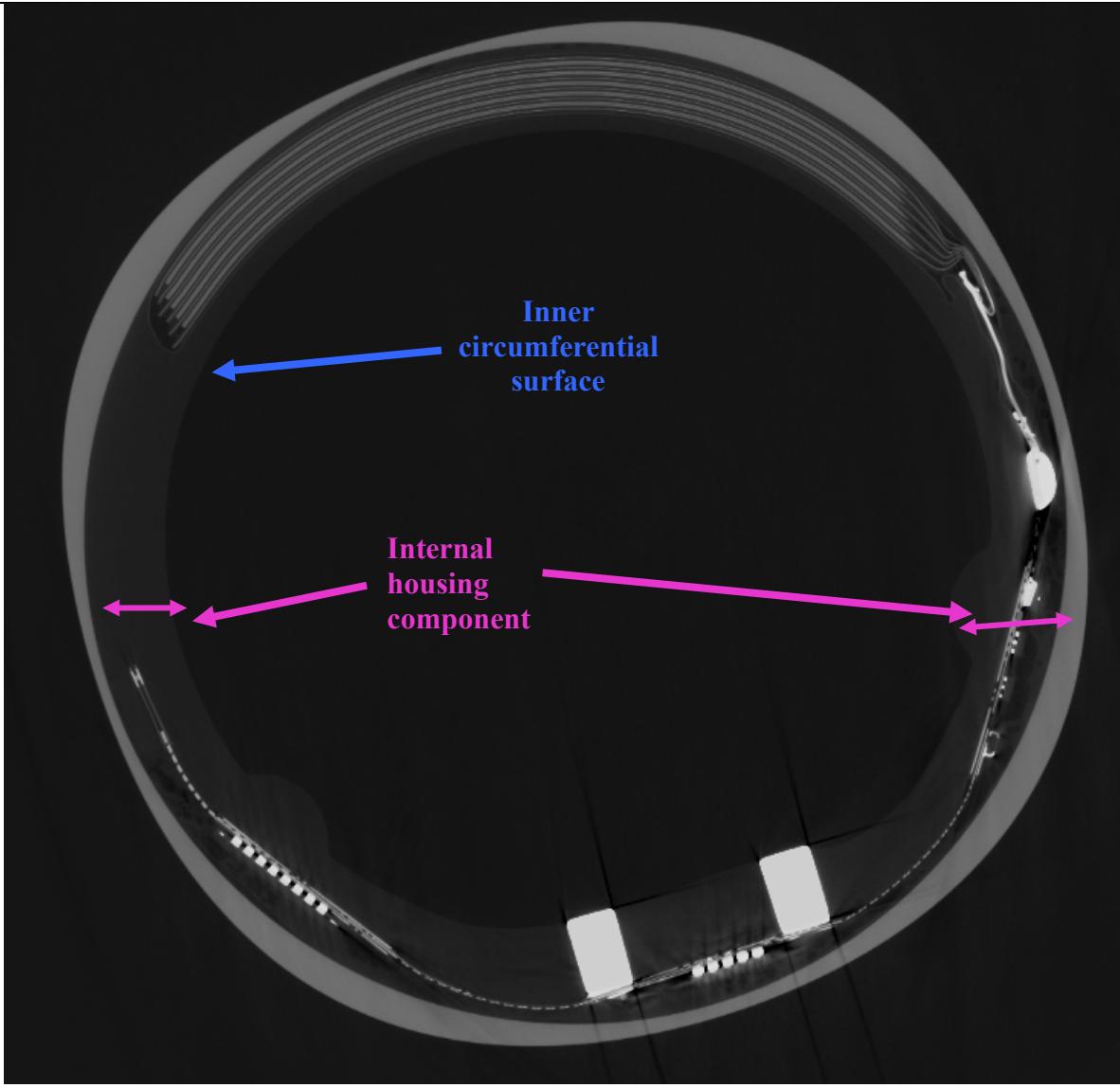
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	
[1-B1] an internal housing component defining an inner circumferential surface of the finger-worn wearable ring device	<p>The Accused Products include an internal housing component defining an inner circumferential surface of the finger-worn wearable ring device. If RingConn argues that the claimed element of “internal housing component defining an inner circumferential surface” is not literally met (Plaintiff disputes any such characterization), this limitation is satisfied under doctrine of equivalents because any difference between the claim element and the accused element is insubstantial. Indeed, the accused element (i.e., potting material used to enclose space on the internal portion of the ring) performs substantially the same function, in substantially the same way, to achieve substantially the same result as the</p>

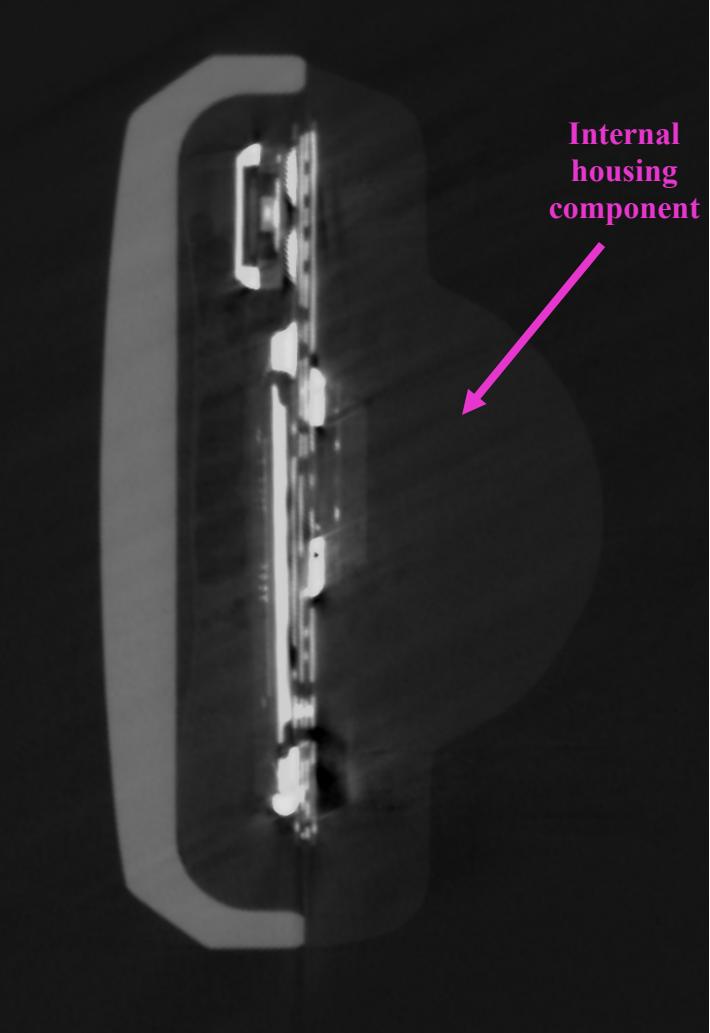
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
finger-worn wearable ring device,	<p>claimed “internal housing component,” and includes a substantially curved, circular, and/or peripheral surface to allow the finger-worn wearable ring device to conform to user’s fingers and to create space to house battery and flexible printed circuit board components.</p>  <p>Inner circumferential surface</p> <p>Internal housing component</p> <p>External housing component</p>

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178



RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)	
	 <p data-bbox="1372 448 1537 554">Internal housing component</p>	

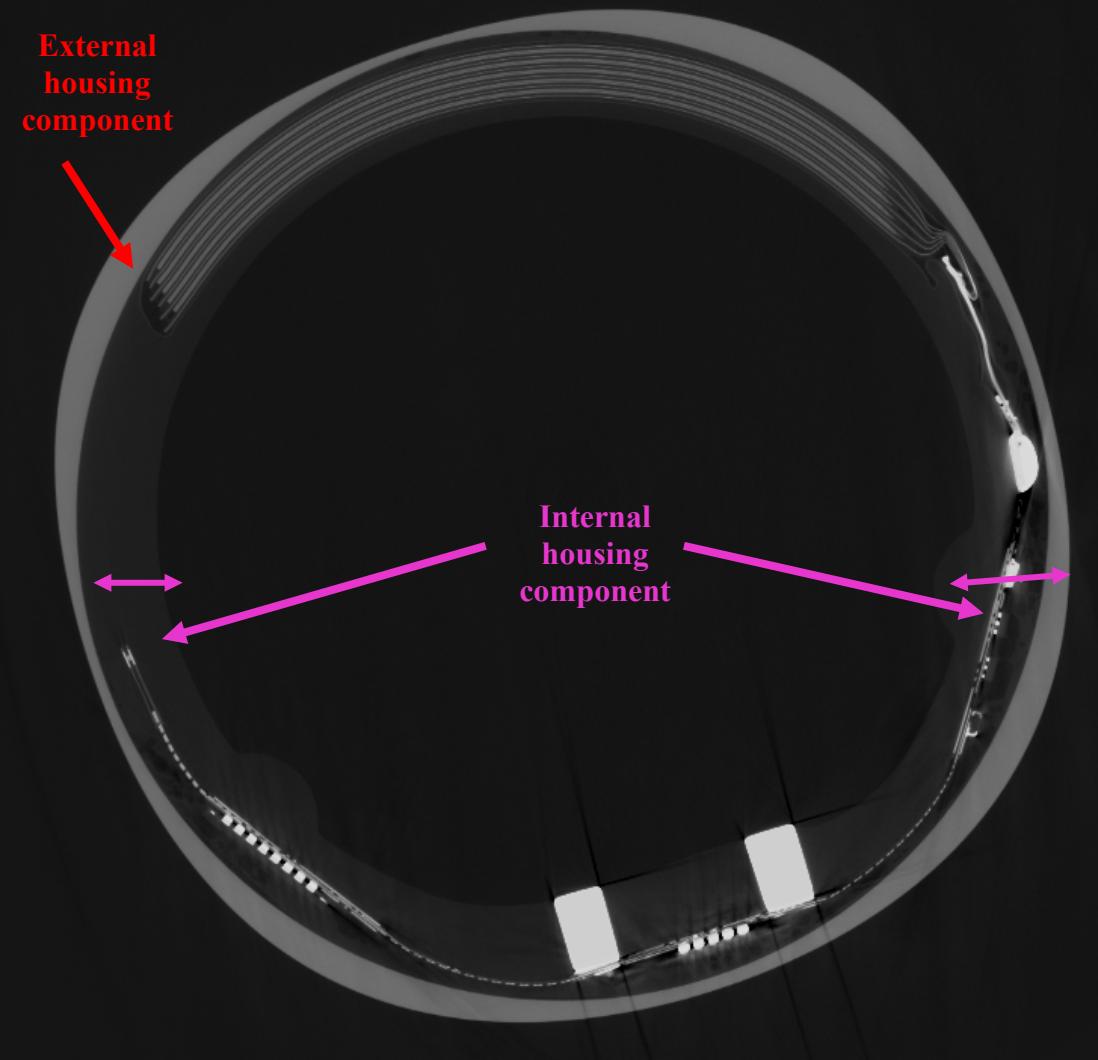
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

<p>Independent Claim 1 of the '178 patent</p>	<p>RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)</p>
	 <p>A photograph of a RingConn Smart Ring, showing its internal housing component and internal circuit board. The image is divided into three parts: a top-down view of the ring's internal housing, a side view of the ring, and a bottom view showing the internal circuit board with a red LED and a green LED. A cyan arrow points to the internal housing component, with the text "Internal housing component having an inner circumferential surface" overlaid in cyan.</p>

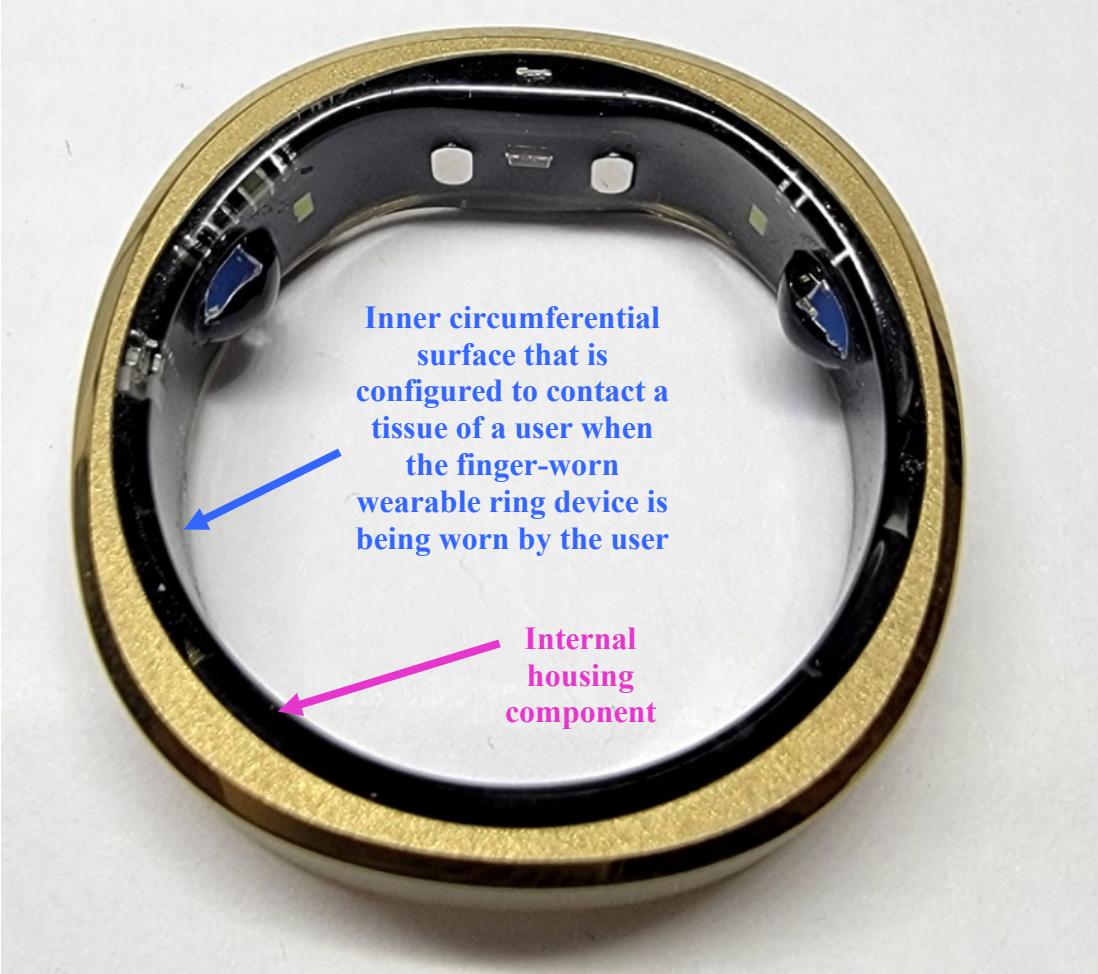
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
[1-B2] the internal housing component coupled with the external housing component,	<p>The Accused Products include the external housing component coupled with the internal housing component. Specifically, as shown below, the internal housing component (i.e., potting) is connected with the external housing (i.e., metal structure):</p> <p>External housing component</p> <p>Internal housing component</p>

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Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p data-bbox="650 360 804 470">External housing component</p> <p data-bbox="1142 833 1296 943">Internal housing component</p>

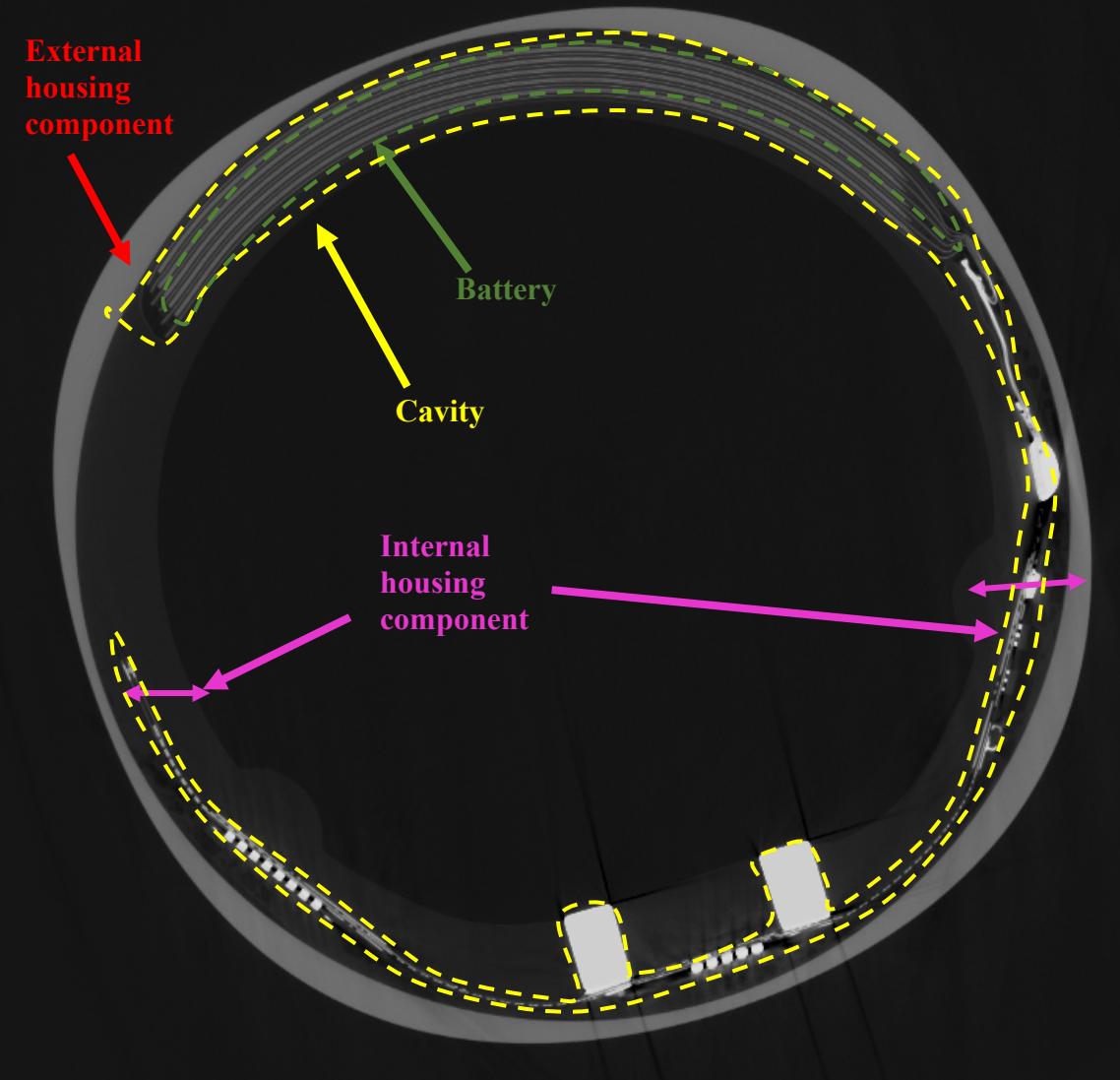
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
<p>[1-B3] wherein at least a portion of the inner circumferential surface of the internal housing component is configured to contact a tissue of a user when the finger-worn wearable ring device is being worn by the user;</p>	<p>The Accused Products include at least a portion of the inner circumferential surface of the internal housing component configured to contact a tissue of a user when the finger-worn wearable ring device is being worn by the user:</p>  <p>Inner circumferential surface that is configured to contact a tissue of a user when the finger-worn wearable ring device is being worn by the user</p> <p>Internal housing component</p>

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	<p>RingConn</p>  Buy Now <ul style="list-style-type: none"> • Compact and Stylish: Smart rings are generally small and lightweight, making them more discreet and comfortable to wear compared to larger wearable devices like smartwatches. • Fitness and Health Tracking: Smart rings may also monitor your sleep patterns, heart rate, blood oxygen saturation, activity tracking, and stress index and provide insights into your overall well-being. • Personalization and Customization: Smart rings often provide options for personalization, allowing you to choose different ring styles, colors, etc. • High accuracy and sensitivity: The finger's pulse signal is stronger and more accurate than the wrist, making it an ideal source of accurate heart rate data. <p>Which finger should the ring be worn for detection? Are there any specific requirements?</p> <p>Does wearing the ring on different fingers result in data deviation in detection?</p> <p>https://ringconn.com/products/smart-ring</p>
[1-C1] a battery positioned within a cavity formed between the internal housing component and the external housing component, wherein the	<p>The Accused Products include a battery positioned within a cavity formed between the internal housing component and the external housing component, wherein the battery comprises a shape and size configured to fit within the cavity between the outer circumferential surface of the external housing component and the inner circumferential surface of the internal housing component. If RingConn argues that the claimed element of “a cavity formed between the internal housing component and the external housing component” is not literally met (Plaintiff disputes any such characterization), this limitation is satisfied under doctrine of equivalents because any difference between the claim element and the accused element is insubstantial. Indeed, the accused element performs substantially the same function, in substantially the same way, to achieve substantially the same result as the claimed limitation, namely the space is formed between the external housing structure and internal potting structure that encloses the battery.</p> <p>As shown below, the battery occupies a cavity or hollow space between internal and external housing. Absent the battery and components, there would be a hollow space:</p>

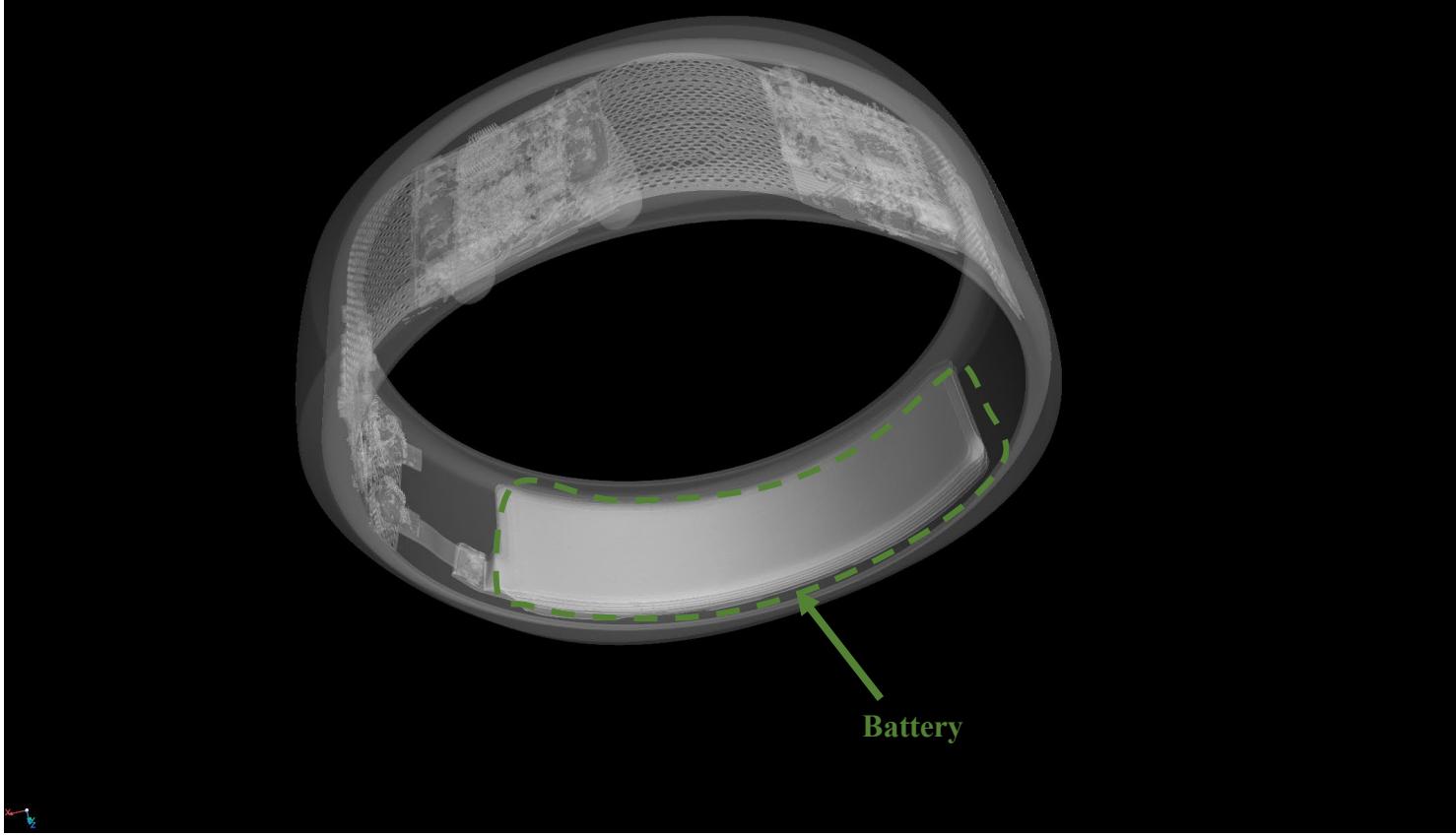
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
<p>comprises a shape and size configured to fit within the cavity between the outer circumferential surface of the external housing component and the inner circumferential surface of the internal housing component,</p>	 <p>The diagram illustrates a cross-section of a RingConn Smart Ring. It features a multi-layered housing structure. The outermost layer is the 'External housing component', indicated by a red arrow. The innermost layer is the 'Internal housing component', indicated by a pink arrow. Between these two layers is a 'Cavity', indicated by a yellow arrow. A 'Battery' is shown within this cavity, indicated by a green arrow. The diagram also shows internal components like a microchip and a sensor at the bottom.</p>

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Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p data-bbox="872 670 984 711">Battery</p>

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Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	<p>Volume 1 => Cylinder 1 alignment system</p>  <p>3D</p>

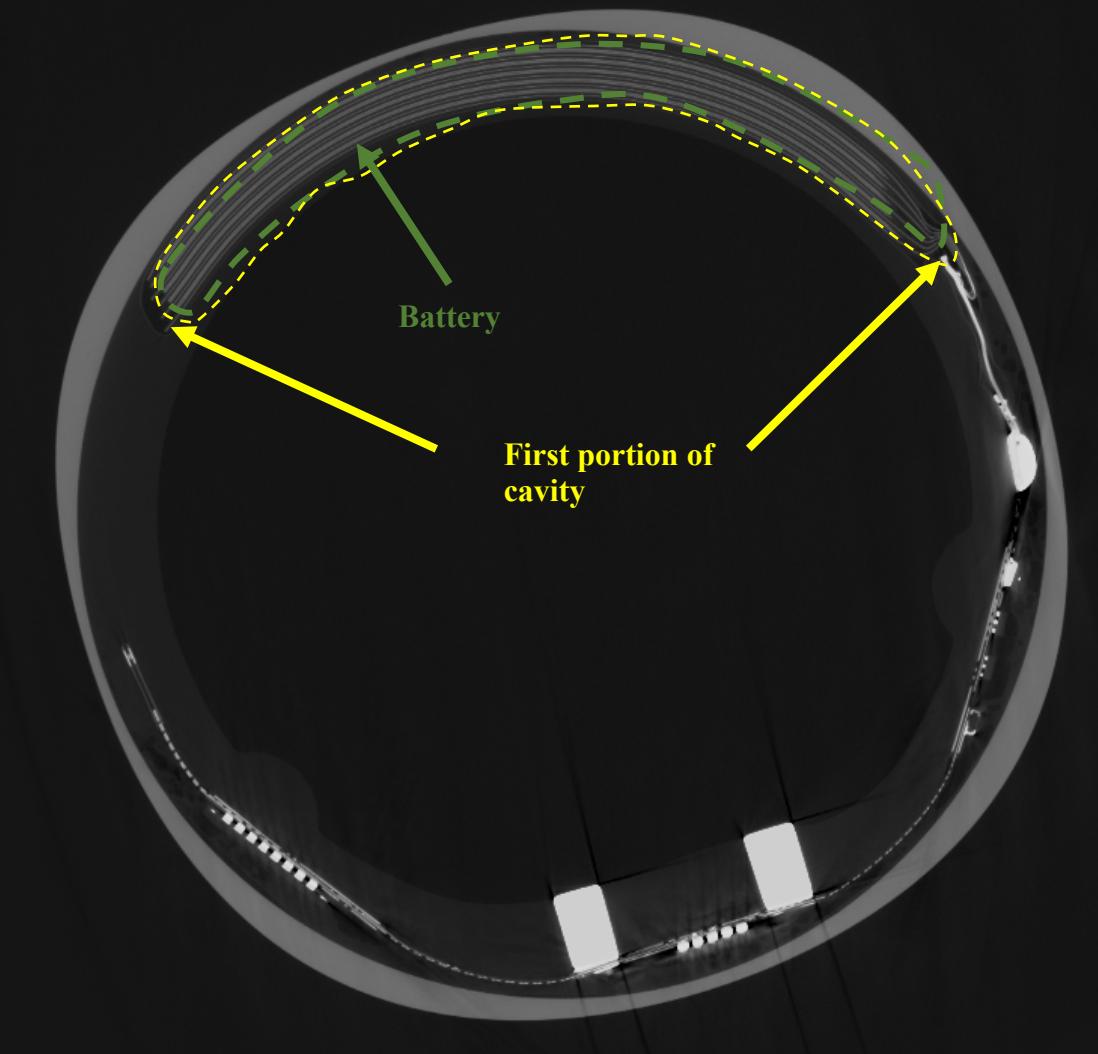
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>Curved battery positioned between the space formed by the external housing (metal structure) and internal housing (i.e., potting material)</p>

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
[1-C2] and wherein the battery extends through at least a first portion of the cavity of the finger-worn wearable ring device;	In the Accused Products, the battery extends through at least a first portion of the cavity of the finger-worn wearable ring device:

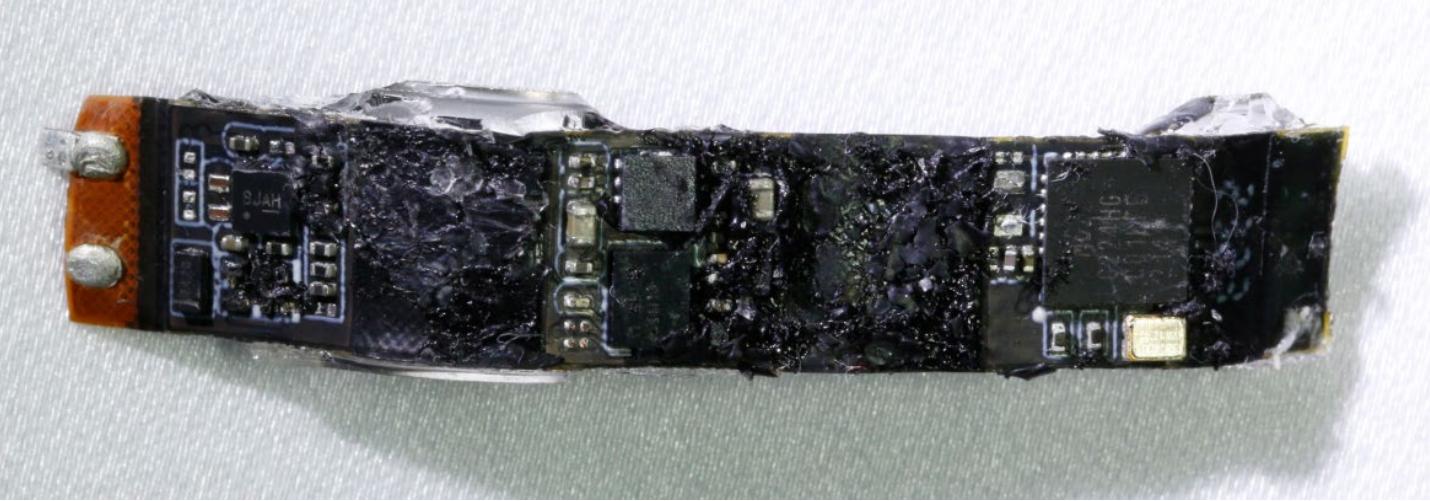
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p data-bbox="734 251 1622 283">RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)</p> <p data-bbox="1030 633 1136 665">Battery</p> <p data-bbox="1136 768 1347 833">First portion of cavity</p>

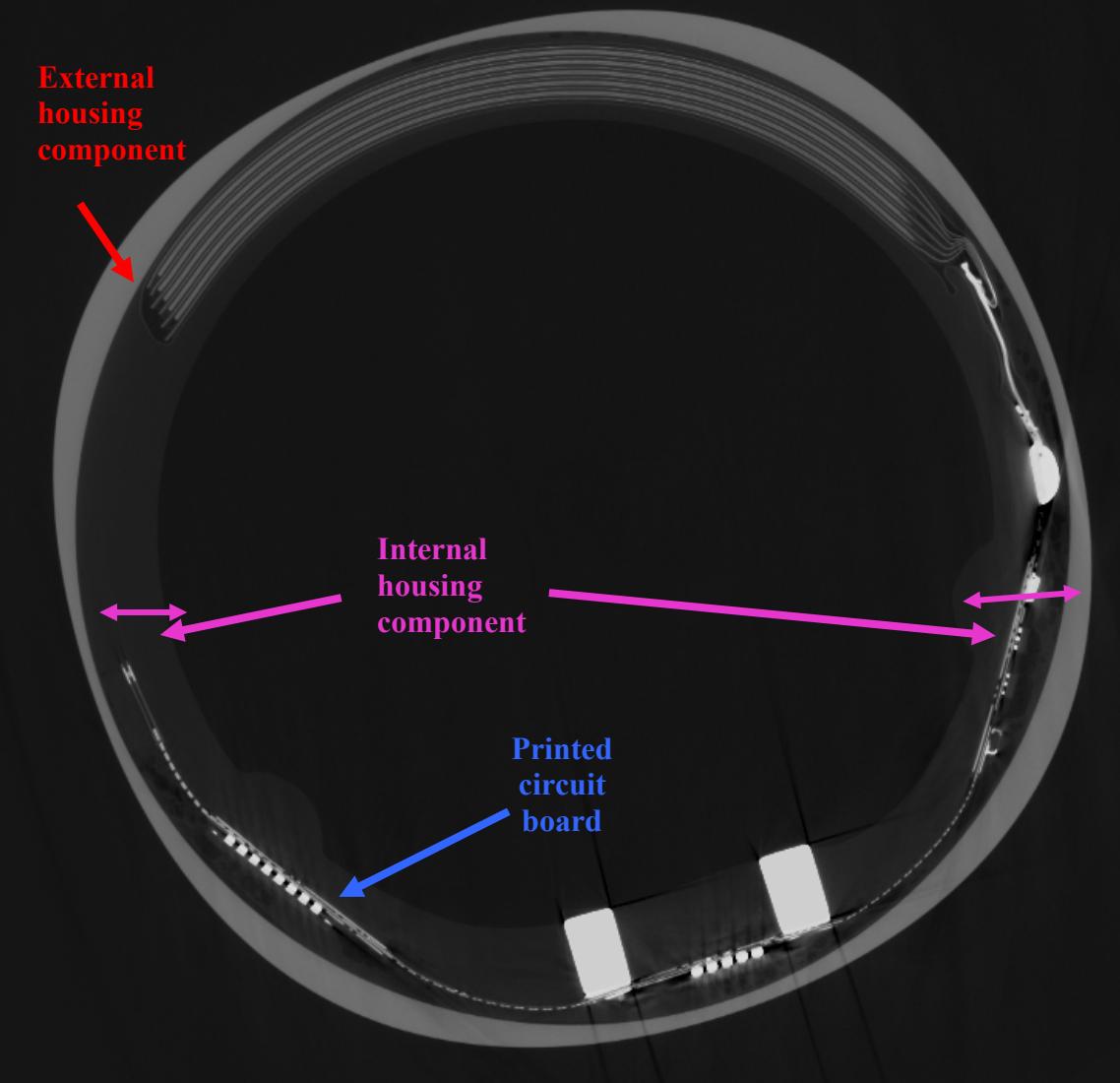
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	<p>In RingConn Smart Ring, Gen. 2, the battery also occupies the first portion of the cavity formed between the external metallic structure and the internal potting material. Absent the battery, there would be a hollow space in its place:</p>  <p>Curved battery positioned between the space formed by the external housing (metal structure) and internal housing (i.e., potting material)</p>
[1-D1] a printed circuit board	The Accused Products include a printed circuit board disposed between the internal housing component and the external housing component:

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
disposed between the internal housing component and the external housing component,	

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Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>External housing component</p> <p>Internal housing component</p> <p>Printed circuit board</p>

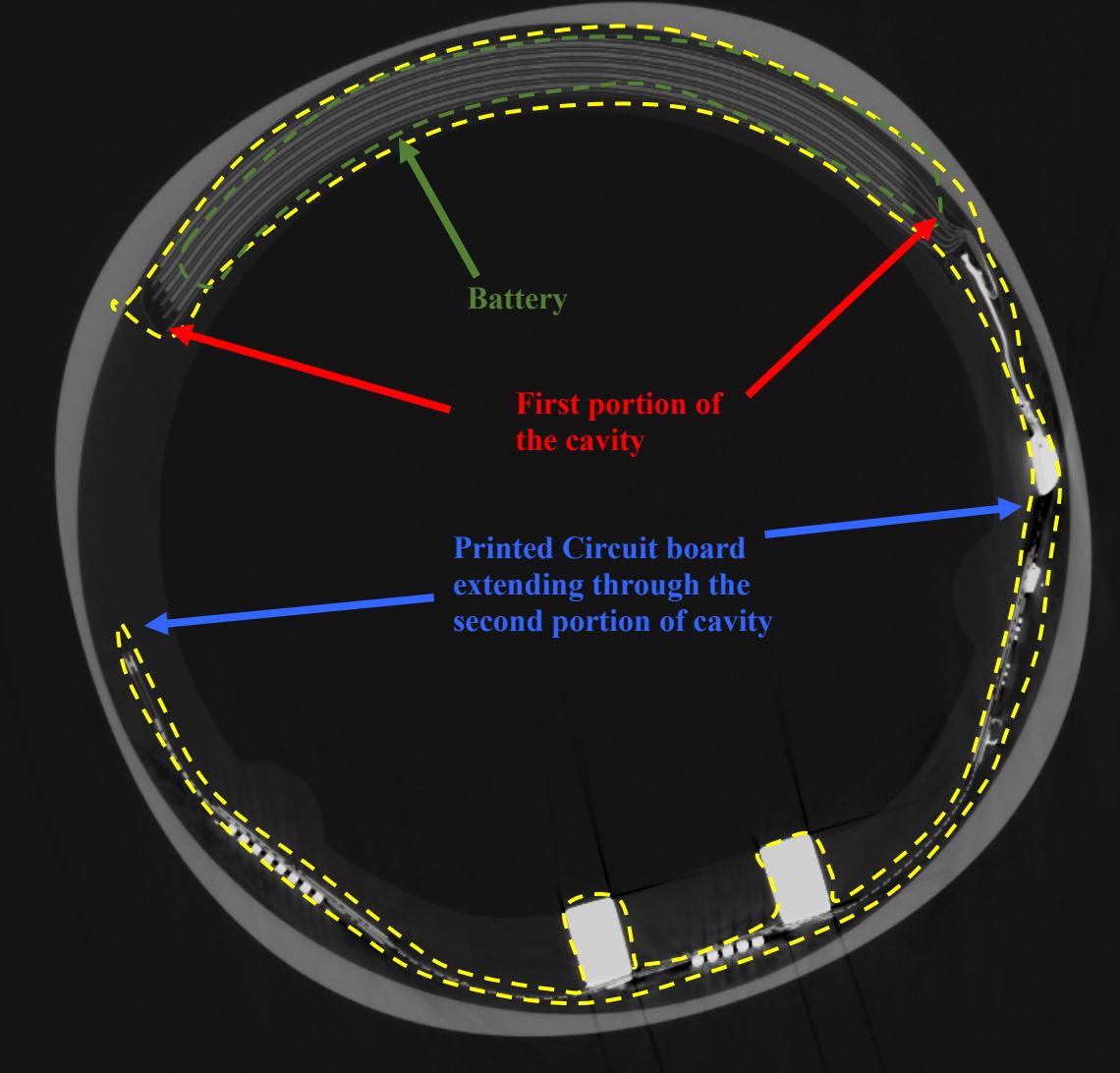
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>Printed circuit board disposed between the internal housing and external housing</p>
[1-D2] wherein the printed circuit board	The Accused Products include the printed circuit board that extends through at least a second portion of the cavity of the finger-worn wearable ring device different from the first portion:

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
extends through at least a second portion of the cavity of the finger-worn wearable ring device different from the first portion; and	

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>The diagram illustrates a cross-section of a RingConn Smart Ring. A central cavity is defined by a dashed yellow line. A green arrow points to a 'Battery' located in the upper portion of this cavity. A red arrow points to the 'First portion of the cavity'. A blue arrow points to a 'Printed Circuit board extending through the second portion of cavity'. The ring's structure is shown in grey, and small white rectangular components are visible at the bottom.</p>

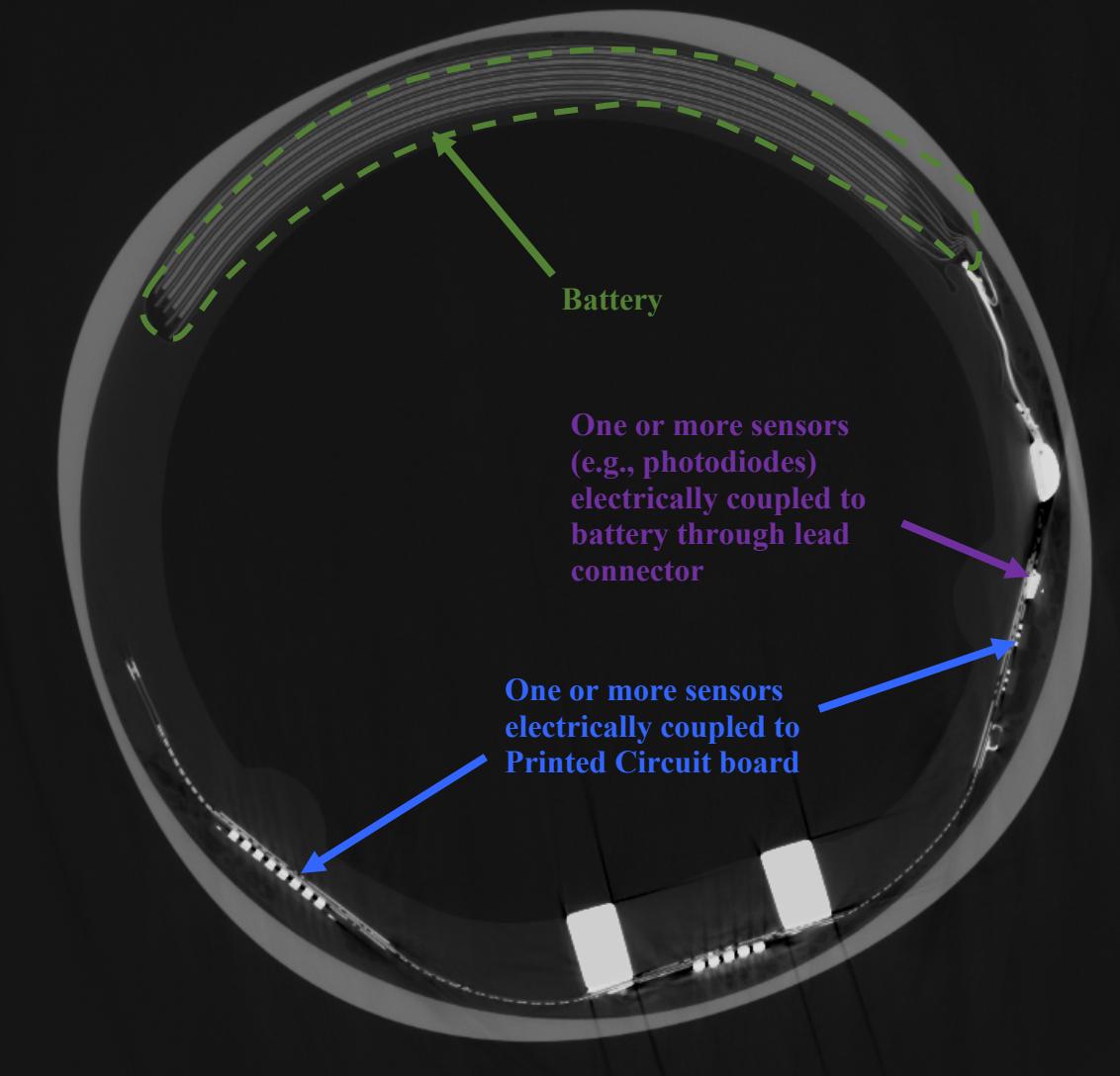
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	
[1-E] one or more sensors electrically coupled with the printed circuit	The Accused Products include one or more sensors electrically coupled with the printed circuit board and the battery and configured to acquire data from the user through the internal housing component:

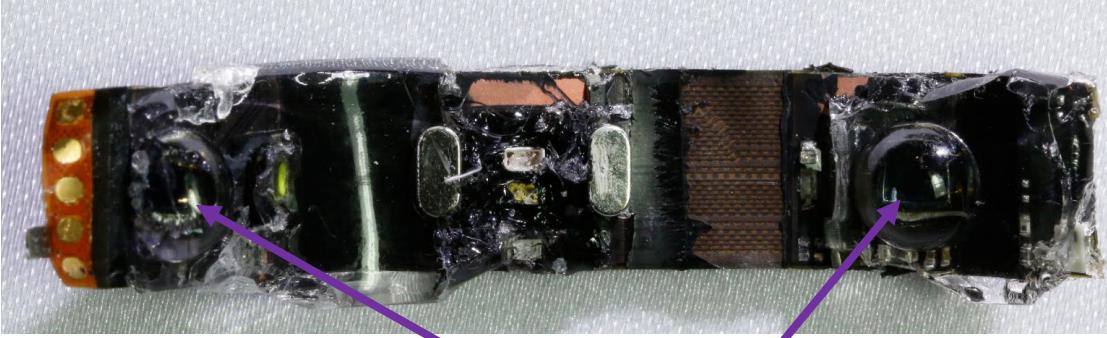
RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
board and the battery and configured to acquire data from the user through the internal housing component.	<p>• Research-Grade Sensors</p> <p>3D Accelerometer</p> <p>Skin Temperature Sensor</p> <p>Multiple Photoplethysmography (PPG) Sensors</p> <p>Safe and Environmentally Friendly Materials</p> <p>https://ringconn.com/product/smart-ring/</p>

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p data-bbox="1178 616 1284 644">Battery</p> <p data-bbox="1178 742 1486 915">One or more sensors (e.g., photodiodes) electrically coupled to battery through lead connector</p> <p data-bbox="1115 1013 1423 1111">One or more sensors electrically coupled to Printed Circuit board</p>

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 A photograph of the internal components of a RingConn Smart Ring. The image shows a printed circuit board (PCB) with various electronic components, including two prominent black cylindrical components labeled as photodiode sensors. Two purple arrows point from the text description below to these two specific components. <p data-bbox="1100 698 1396 915">Photodiode Sensors coupled with the printed circuit board and the battery and configured to acquire data from the user</p>

RingConn Infringement Claim Chart – U.S. Pat. No. 11,868,178

Independent Claim 1 of the '178 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p data-bbox="1267 1019 1584 1199">One or more sensors electrically coupled with the printed circuit board and the battery and configured to acquire data from the user through the internal potting</p>